## SECTION 64.2009 CPNI CERTIFICATE OF COMPLIANCE

I, Hershel H. Layne, President of Capitol Radiotelephone Company, Inc. d/b/a Capitol Paging (the "Company"), a Commercial Mobile Radio Service (CMRS) provider of paging service, hereby certify that I have personal knowledge of the Company's operating procedures with respect to Customer Proprietary Network Information (CPNI), and that, to the best of my knowledge, information and belief, those operating procedures are sufficient to ensure compliance with Part 64 of FCC rules relating to the Company's use and safeguarding of CPNI as I understand them. The basis for my certification is summarized below:

The paging service provided by the Company is billed to the customer monthly on a flatrate basis. As a result, the Company collects at most only minimal information that could be considered CPNI under the FCC's rules. Any use or disclosure of or provision of access to customer-specific information by the Company, whether CPNI or not, requires my approval.

The Company uses, discloses or provides access to CPNI only for the purpose of initiating, rendering, billing or collecting for the paging service provided by the Company. The Company does not disclose or provide access to CPNI to any third parties for any purpose, except to law enforcement personnel in compliance with a subpoena.

The Company does not employ any third parties to market paging service on its behalf. To the extent any marketing of the Company's paging service is done, it is done solely by one or more employees of the Company, and such employees are not provided access to any CPNI for this purpose unless the customer involved specifically initiates a request that requires employee access to CPNI in order to respond.

Hershel H. Layne

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